



Review of Schwartz/Tech Rad
materials re Sooner Deal

1. (For Jimmy Groves) Is Mr. Schwartz willing to give us info re EDO Corporation?
2. Are there personnel still w/ or available to EDO who might be able to reconstruct info which would be helpful in determining proper remediation?
3. pp 2 of Tech Rad letter - issue of acceptable level is an important one. How do we relate this site to levels used at K-11 Cushing site & those proposed for Fansteel?
4. curiousity item - ck file for date site first came to our attention compared to 1969 date of cessation of operation
5. pp 1, P 1 - first line "less" - 2 types?
6. pp 2, P 4 - do we have agreement of Duncan & WMK in lab? Is lab able to do as described? The lab used 250 gram soil samples on the rubble site, I believe
7. pp 2, P 5 - I believe that the instrument readings will be in cpm / 100 cm² (or cpm / 57 cm²) which must be converted mathematically to dpm / 100 cm². Also, the 100 dpm / 100 cm² as a "speed limit;" do we agree w/ this? Another concern here is failure to testing mesh

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between "fixed" and "removable" alpha
If there is a controversy re this
distinction, then this is one issue which
should be included in any letter or
discussion w/ Tech Rep - There is
a "PR" concern here in that, if there ~~are~~ are
concerns raised by current occupants of
building or by the press, we should
consider taking surface alpha levels
down as close to zero as technically
feasible, considering cost also.

8. pp 2, Pg - I think a 4R/hr survey of
old Army-Navy building should be
done also. I think neighbors to the
west and southwest should be
contacted re this as well as for PR
reasons. My point here is contact more
than just one owner & during contact
extend survey (if wanted by buyer/tenant)
to those properties of all who are contacted
where requested or if the situation so
indicates, an alpha survey should be
considered (or done) at selected locations
on these properties & inside these houses.
The reference in this P to "P3" is
incorrect; it should say "P5".

pp 2(2)

8A. pp 2, PG - As a second thought,
my suggestion for extended surveys
(in item 8) at neighbors' properties
should have included the suggestion
that such surveys should be
conducted by CPS/RPD personnel only
or, as an alternative, OSHD personnel
and contractor (Tech Rad) personnel.

9. pp 2, P7 - The emphasis ~~focuses~~ on "public access" areas should be noted.

10. pp 3, P8 - lacking better info, I have estimated the site to be 100' x 100' excluding the Stereode Bldg., the bar ditch nearby street, & the alley. Thus, 1% is about 10-15' x 10-15'. This "plot plant" operation is a good suggestion, I think; however, I wonder how we (OSDH & TechRep) will determine where the plot will be. Also, the entire site is quite small, & this may bring up some problems. I think a, b, sc are the more important elements here.

11. pp 3&4, P9 - re 9(c) especially, I worry about the size of the site and the need for another site nearby where some activities could be carried on to allow necessary activities on-site to go ^{on} w/out inconveniences.

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12. pp 4, 2nd P under "Standards & Criteria" —
There seems to be missing copy or
~~or~~ a typo which makes the first
sentence incomprehensible,

13. pp 5, 3rd line — There is copy missing
or a typo which confuses the meaning
of the sentence. However, there is a point
to this sentence: we (OSDH) should
consider taking soil samples in the
Clinton area to determine the
background soil radium content.

14. pp. 5, sub-P's a, b, & c — For the moment,
I will not disagree with any of
these proposals. However, I do have
some comments about them:

- (2) The use of the word "surface" here
implies that these are to be taken
at the surface of the ground.
Referring to Jack Rad's survey data
(next pp) leads me to wonder if
a surface reading limit of 20 will
not cause the ~~entire site to be~~
need for the entire site to be cleaned
up! Another way of looking at this

is to ask the question: Are the low levels (lets say the 25's and 30's in the southeast corner of the site), which were taken at 1 meter above the ground, the result of normal background (probably not), are they the result of direct gamma and/or scattered compton from the radium elsewhere on the site (probably are to some extent), or are they the result of gamma radiation coming & more-or-less ~~scattered~~ up from the ground ~~just~~ directly below the detector (maybe, maybe not)? A third way of looking at this is to ask the question: If, in some way, we could remove the radium from a very small area centered on the point where the 1-meter level is 1200, would the remainder of the surface readings fall to levels below 20 $\mu\text{R}/\text{hr}$?

(2) In addition, regarding the figure of "20," is this the instantaneous maximum reading observed over a short period (say 1 minute), or is it an averaged value of several maximums and minimums observed over a short period (say 1 minute); I prefer the latter.

(B) Are these figures consistent with those agreed to / used at K-M Cushing and those proposed for Faussteel? If not, we need to consider what our position should be.

(B) Second, these values assume a relatively uniform distribution of the radium in the soil. Should the possibility that all or much of the radium on the site is not uniformly mixed with the soil enter into this proposed limit?

(B) Third, there is a direct, proportional (although perhaps tenuous) relationship between the limits of (A) and (B). Thus, the question arises: Should (A) and (B) limits have equal status, should (A) have priority over (B), or should (B) limits be the final criteria? As written, the language implies that the site as a whole and each individual sample of the site must meet the limits of both (A) and (B).

(C) For the Eberline PAC alpha detector, we may find that the 100 dpm/100cm² limit corresponds to an instantaneous, ^{resolving} essentially zero in cpm, due to detector geometry and efficiency, among other things.

15. The results of the radiation survey by Tech Rad ~~appear to be~~ quite consistent with survey data by various members of the OSDH staff over the years.

16. Site Characterization Cost Estimate page -

Since they propose to use OSDH / SEL / Rad Lab for analysis of samples, are the dollar amounts per sample consistent with SEL cost schedules? Would SEL want to make a written agreement on the analysis of these samples with either CPS / RPD or Tech Rad?

There is an implication in this estimate that Tech Rad intends to buy an alpha detector and a μ R meter!

17. ~~Preliminary~~ Preliminary Remedial Action Plan page, no item 3 -

Contrary to the ~~initial~~ conditions stated in this sub-paragraph, I suggest that a well-conceived public relations program be started as soon as all parties involved have agreed to a plan of action ~~concerned~~ to survey the site and remediate it. In other words, there should be no delay in preparing and carrying forward a public

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relations program once we have some
definite schedules and site-activities
decided upon.

18. CERCLA page -

What's the latest from our Hazardous
Waste Service people re this issue and
Sooner Deal?

Material reviewed and
Comments prepared
3-11 and 12, 1992 by
Dale W. Kirsch